

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
v.)	CASE NO. 2:07cr11-MHT
)	
KEVIN ONEIL BROWN)	
)	

MOTION TO CONTINUE SENTENCING HEARING

COMES NOW the Defendant, **KEVIN ONEIL BROWN**, by and through counsel of record, and shows unto this Honorable Court as follows:

1. The Defendant has been ordered to appear before this Honorable Court for sentencing on August 31, 2007 at 10:00 a.m.
2. Undersigned counsel for Defendant Brown has a schedule conflict as he will be in Colorado conducting a pretrial investigation on a complex capital murder case during the week in which Mr. Brown is scheduled for sentencing. (See State of Alabama v. Winston Brent Springford, Jr., CC-2006-1821-S, *In the Fifteenth Judicial Circuit for the State of Alabama, Montgomery County Circuit Court*). Said investigation was scheduled far in advance of the Court's order setting Mr. Brown's sentencing hearing for August 31st.
3. Undersigned counsel cannot reschedule the investigative trip to Colorado because he is the lead attorney for Mr. Springford in the aforementioned capital murder case, and will be accompanied on the trip to Colorado by co-counsel, a mitigation specialist, and others who are members of Mr. Springford's defense team. The undersigned will find it difficult

to coordinate the multiple schedules of his and the other defense team members. Additionally, said trip must be conducted prior to the Springford trial, which will likely be set for some time in the fall of 2007.

WHEREFORE, Defendant Kevin Oneil Brown moves for an Order continuing his sentencing hearing.

RESPECTFULLY SUBMITTED this 25th day of July 2007.

s/ William R. Blanchard (BLA029)

Blanchard Law Offices

Post Office Box 746

Montgomery, Alabama 36101-0746

Phone (334) 269-9691

Fax (334) 263-4766

bill@blanchardlaw.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
)	
v.)	CASE NO. 2:07cr11-MHT
)	
KEVIN ONEIL BROWN)	
)	

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: AUSA Chris Snyder, and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: n/a.

Respectfully submitted,

s/ William R. Blanchard (BLA029)

Blanchard Law Offices

Post Office Box 746

Montgomery, Alabama 36101-0746

Phone (334) 269-9691

Fax (334) 263-4766

bill@blanchardlaw.com